## Community Development Financial Institutions Fund



U.S. Department of the Treasury
FY 2001 Small and Emerging CDFI Assistance
(SECA) Component, CDFI Program

## What topics will the workshop cover?

#### Part I: CDFI Fund

- → CDFI Fund Background and Mission
- → CDFI Eligibility & Certification Requirements

## Part II: Small and Emerging CDFI Assistance

- → Comprehensive Business Plan
- → Technical Assistance Proposal
- → Evaluation Criteria & Review Process

## **CDFI Fund Background & Mission**

#### **Created**

- Part of the Riegle Community Development and Regulatory Improvement Act of 1994
- Placed within the Department of the Treasury in 1995

#### **Mission**

- To expand access to credit and financial services in distressed urban, rural, and Native American communities
- To bring private sector financial services into distressed communities.

## **CDFI Program & Initiatives**

#### **CDFI Program**

- Certification
- Core Component
- Intermediary Component
- Small and Emerging CDFI Assistance (SECA) Component

#### **BEA Program**

**Presidential Microenterprise Awards** 

**Native American Lending Study/Action Plan** 

**Training Program** 

**Research Activities** 

#### What is a CDFI?

- A private, non-governmental organization whose primary mission is to provide loans or investments in underserved communities or to underserved people;
- A nonprofit or for profit entity; and
- Provides services that support financial transactions and is directly accountable to its community or to its customers.

## Why are CDFIs Unique?

## CDFIs are Unique:

- Among community development organizations CDFIs are different in that they are Financial Institutions.
- Among financial institutions CDFIs are different in that they have a Community Development focus.

## **Examples of CDFI Types**

- Banks or bank holding companies
- Business loan funds
- CDFI Intermediaries
- Credit unions
- Facilities loan funds
- Housing loan funds
- Microenterprise loan funds
- Multi-bank CDCs
- Venture capital funds

## Requirements for Funding Eligibility

## An applicant must be:

- ✓ a legal entity at the time of application, as evidenced by organizational documents.
- ✓ certified or demonstrate that it will meet all six certification requirements by March 27, 2003.

#### **CDFI** Certification

#### Requirements for CDFI Certification or Re-Certification

- ✓ In order to be certified, an applicant must be a legal entity and must **currently** meet all six certification requirements.
- ✓ An applicant whose certification has expired or will expire by **September 30, 2001**, must apply for re-certification.
- ✓ Industry Data is required for all organizations seeking certification or re-certification.

## Eligibility/Certification Criteria

An entity that meets *ALL* of the following eligibility requirements will be certified as a CDFI:

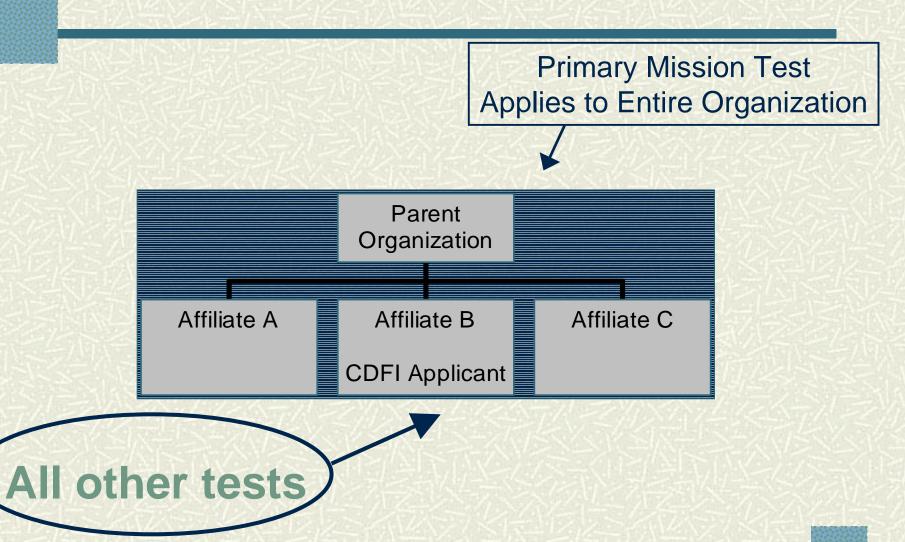
- 1. Primary Mission
- 2. Target Market
- 3. Financing Entity
- 4. Development Services
- 5. Accountability
- 6. Non-Government Entity

**Purpose:** To determine whether an applicant and its *Affiliate(s)* collectively have a primary mission of promoting community development.

**Definition**: *Affiliate* - any company or legal entity that controls, is controlled by, or is under common control with another company.

**Key Criteria:** For purposes of this requirement, "promoting community development" is defined as purposefully improving the social and/or economic conditions of:

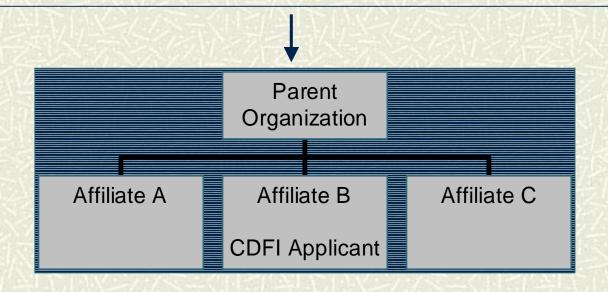
- (1) *underserved people* (including low-income people and people who lack adequate access to capital and/or *Financial Services*); and/or
- (2) residents of distressed communities (which may include *Investment Areas*).



#### **Provisions Applicable to:**

- \*Depository Institution Holding Company & Affiliates
- \*Subsidiaries of Insured Depository Institutions

## All Tests Applied To Entire Family Collectively and CDFI Applicant Individually



#### **Documents to submit:**

- ✓ An applicant may meet this requirement if the <u>organizational documents</u> (e.g., incorporating documents, bylaws, annual reports) of the applicant and its Affiliate(s) evidence a primary mission of community development.
- ✓ If a primary mission of community development is not clearly evidenced by the organizational documents, an entity may provide additional information to show that the collective activities and products of the applicant and its Affiliate(s) evidence such a primary mission.

## Financing Entity

Purpose: To determine whether an applicant is a Financing Entity, an *Insured Depository Institution, Depository Institution Holding Company,* or insured credit union, or whether it can otherwise demonstrate that it is a *Financing Entity*.

## **Financing Entity**

Key Criteria: The Fund will consider information about an applicant's assets and its allocation of staff resources to determine whether the applicant's combined provision of Financial Products and Development Services make up a majority (more than 50%) or, in certain circumstances, a plurality of its activities.

## **Financing Entity**

#### **Key Criteria:**

If the combined Financial Products and Development Services are <u>not</u> a majority of an applicant's activities, the Fund will also consider the applicant's *Financing Related Activities*.

**Definition**: *Financing Related Activities* - Activities that support the applicant's provision of *Financial Products*, including: (1) predevelopment grants and (2) loan packaging provided in conjunction with the applicant's financing. See page 21 of the funding application.

# Financing Entity: Non-Regulated Applicants

#### **Documents to submit:**

- ✓ Asset Information Table and notes explaining how information in the table is derived from the financial statements.
- ✓ Staff Allocation Table and brief description of how the allocation was derived.
- ✓ Financial statements for most recently completed fiscal year (audited, if available).

## Financing Entity: Regulated Entities

 Banks, thrifts, and credit unions are automatically considered to be Financing Entities.

#### **Documents to submit:**

- ✓ Organizational documents, and
- Certificate of insurance (e.g., FDIC, NCUA)

Purpose: To determine whether an applicant's activities are principally directed to serving a *Target Market* or *Target Markets*.

#### To meet the Target Market test, applicants must:

1) Serve an eligible *Target Market* or *Target Markets*; and

2) Demonstrate that at least 60% of the applicant's total activities are directed toward the identified *Target Market(s)*.

## Ways to meet the Target Market test:

- ✓ Serving *Investment Area(s)*
- ✓ Serving Low-Income Targeted Population
- ✓ Serving Other Targeted Populations
- ✓ Or a combination of the above

## An Investment Area will be eligible if it:

Is entirely located within the *United States*;

- 1) Is comprised of an eligible Geographic Unit(s); and
- 2) Either:
  - a) Encompasses or is located in a Federally-designated Empowerment Zone or Enterprise Community; or
  - b) Meets at least one of the CDFI Fund's five tests of economic distress and has significant unmet needs for loans or *Equity Investments*.

## Target Market: Investment Areas

#### **Documents to submit:**

- ✓ Investment Area Worksheet & Map from the CDFI Fund On-Line Help Desk <a href="www.treas.gov/cdfi">www.treas.gov/cdfi</a>;
- ✓ A narrative describing the significant unmet capital or financial services needs of the Investment Area; and
- ✓ Applicant Activity Table with narrative.

#### **Low-Income Targeted Population**

Is eligible if it is comprised of individuals whose family income is not more than:

- ✓ For metropolitan areas, the greater of 80% of the metropolitan area median family income or the national metropolitan area median family income;
- ✓ For non-metropolitan areas, the greater of 80% of the national non-metropolitan area median family income, or 80% of the statewide non-metropolitan area median family income.

### **Other Targeted Population**

- ✓ Will be found to be eligible if it is an identifiable group of individuals that is not a *Low-Income Targeted Population* but nevertheless, lacks adequate access to loans, *Equity Investments*, or *Financial Services*.
- ✓ Must include people who have historically been denied access to loans, *Equity Investments*, or *Financial Services* due to factors that are unrelated to their investment or credit worthiness such as gender, race, ethnicity, national origin, and creed.

#### **Documents to submit:**

- For Low-Income Targeted Population
  - ✓ Applicant Activity Table with narrative
- For Other Targeted Population
  - ✓ Brief analytical narrative demonstrating eligibility
  - ✓ Applicant Activity Table with narrative

## **Development Services**

Purpose: To determine whether an applicant provides *Development Services* in conjunction with its financing activities.

## **Development Services**

✓ Must be directed to the recipients or potential recipients of the applicant's Financial Products

#### AND

✓ Must prepare or assist the recipient in accessing the applicant's Financial Products.

**Examples of Development Services** – homebuyer counseling, business plan development, and training on financial literacy.

## **Development Services**

#### **Documents to submit:**

✓ Brief Narrative describing the content of your Development Services, the expected recipient(s) of such services, and how the services relate to your Financial Products.

<u>Note</u>: If Development Services are provided by another organization through a contract, also describe the contract terms and how your organization directs the provision of those services.

## Accountability

Purpose: To determine whether an applicant maintains accountability to its defined *Target Market*.

## Accountability

 Representatives of the Target Market are included on the governing board

#### OR

- Other approaches are used to satisfy this requirement, such as
  - ✓ advisory boards
  - √focus groups
  - ✓ community meetings

## Accountability

#### **Documents to submit:**

- ✓ A list of Board Members (indicate which members are representative of the defined *Target Market* and how they are representative).
- ✓ If accountability is maintained by means other than your governing board, provide a narrative describing how your organization maintains accountability to its defined *Target Market*, and why accountability cannot be achieved through the governing board.

## **Non-Government Entity**

Purpose: To determine that an applicant is a non-governmental entity and is not controlled by one or more government entities.

## **Non-Government Entity**

The Fund has identified a number of factors that, in general, indicate government control.

Note: Organizations operated or controlled by a tribal government are not considered governmental entities for the purposes of this test.

## **Non-Government Entity**

#### **Documents to submit:**

- ✓ A list of Board Members with an asterisk (\*) by any members who are government employees or elected or appointed government officials.
- ✓ If the applicant checks "yes" under any question (a-g) on page 30 of the funding application, provide a brief narrative explaining the circumstances and whether this affects the applicant's ability to meet this test.

#### **CDFI** Intermediaries

✓ Meet all six CDFI eligibility requirements;

#### AND

✓ Focus their *Financial Products* and other activities primarily on CDFIs.

## BREAK

# Part II: Additional SECA Component Application Requirements

#### Items to be covered:

- → Key dates
- → Previous TA funding rounds
- → Amount and type of assistance available
- → SECA Component
  - SECA Eligibility
  - Comprehensive Business Plan
  - Technical Assistance Proposal
  - Evaluation criteria & review process

#### KEY DATES

## Small and Emerging CDFI Assistance (SECA) Application Submission Dates

Submission on or after: November 27, 2000

Application Deadline: March 27, 2001 - 6 p.m. EST

## **Technical Assistance Funding History**

Applications Received:	FY98 112	FY99 160	FY00 141
<b>Applications Funded:</b>	70	88	75
TA Grants Awarded:	\$3 million	\$4 million	\$3.5 million

## **SECA Component**

The SECA Component replaces the TA Component, administered by the Fund in 1998, 1999, and 2000 under which the Fund provided only TA grants to CDFIs and entities proposing to become CDFIs.

#### **SECA**

**Purpose:** To provide limited amounts of technical and financial assistance or only technical assistance to CDFIs and entities that propose to become CDFIs in order to enhance their capacity to serve their respective Target Market(s).

#### SECA Available for FY 2001

✓ FY 2001 SECA Component - \$10.0 million available

✓ The \$5 million/3 year cap to an awardee and its *Affiliates* extends also to the SECA Component

## **Funding Request**

## SECA applicants can apply for:

- 1) TA only; or
- 2) FA and TA (if applying for FA you must apply for TA).

## TA/FA Applicants

Applicants applying for TA and FA must meet "Small and Emerging" requirements.

## **TA Only Applicants**

Applicants applying for TA only, do not have to meet "Small and Emerging" requirements.

## "Small and Emerging" Requirements

## A Small and Emerging entity has:

- ✓ total assets not exceeding \$5 million as of the last day of the applicant's most recently completed fiscal year that ended prior to March 1, 2001; and
- ✓ never received a Notice of Award from the CDFI Fund for FA (an award from the CDFI Program which requires matching funds) prior to the date of application for SECA Component funds.

## "Small and Emerging" Requirements

## For Banks, Thrifts and Bank Holding Companies only:

- ✓ Received its original charter from its Federal or State regulatory agency on or after November 27, 1997.
- ✓ Never has received a Notice of Award from the CDFI Fund for FA.

#### SECA Available for FY 2001

- Generally, maximum <u>Technical Assistance</u>
   (TA) award is \$50,000
- Maximum <u>Financial Assistance</u> (FA) award is \$150,000
- Combined <u>FA and TA</u> maximum award request is \$200,000

#### **TA Awards**

#### TA awards under SECA:

- → Are made in the form of grants and require no matching funds:
  - ✓ Can be used for capacity building
  - ✓ General maximum TA award amount of \$50,000

## For activities that <u>enhance the capacity</u> of the applicant to:

- make loans and investments;
- ✓ provide development services to its Target Market;
- ✓ and realize its business plan.

#### Consulting Services

- Contracting with consultants

#### → Staff Salary

- Paying staff salary for non-recurring activity

#### → Technology

- Operating efficiencies through technology

#### → Training

- Training for staff and management

#### → Other

#### **Consulting Services**

- → Lead a strategic planning process
- → Develop job descriptions
- → Create personnel policies and procedures
- → Develop a marketing plan for financial products
- → Conduct market research and analysis
- → Analyze and modify financial products
- → Develop capitalization/fundraising strategies
- → Conduct initial financial audit for applicant

#### Staff Salary for Specific Tasks, such as:

- → Updating a market analysis
- → Developing underwriting criteria for a new loan product
- → Designing and building a database
- → Research and development for a new Development Services curriculum (such as loan qualification, homebuyer training)

## Staff Salary Requirements

SECA supported salary may not cover more than 50% of any staff person's salary within a one (1) year period.

SECA support for staff salary may not be more than 24 months in duration.

#### **Technology**

- → New or upgraded software, hardware and peripherals
- → Database improvements to manage fundraising and investor relations
- → Portfolio management software
- → LAN and inter office communication
- → Hardware upgrades to be Internet compatible
- → Other office technologies

#### **Training**

Cost of tuition or registration for training events, for example:

- ✓ organizational development; and
- ✓ lending or investing activity.

(Training should be related to business plan)

## **Ineligible Uses of TA Grant**

- →Office space rent
- → Interest payments on borrowed funds
- → Cost of an annual financial audit (other than first one)
- →Other operating expenses
- → Consulting services to complete a Core/Intermediary application to the CDFI Fund
- → Preparation of funding proposals (by staff or consultant)

## **FA Requirements**

- ✓ Applicants must be "Small and Emerging"
- ✓ Applicants may request FA, but only in conjunction with a request for TA
- ✓ Matching funds requirements for FA
- ✓ Maximum FA award \$150,000
- ✓ Combined FA and TA maximum award request may not exceed \$200,000
- ✓ Broad range of types of FA

## **FA Types of Assistance**

- → Grants
- → Equity investments (for profits only)
- → Loans
- Secondary Capital (insured credit unions only)
- → Deposits/credit union shares

## **FA Matching Funds**

- \$1 for \$1 match
- Must be from a non-Federal source
- Must be non-Federal funds
- Must be comparable in <u>form and value</u> to assistance requested from the Fund
- Must be obtained or legally committed between January 1, 1999, and December 31, 2002

### **Application Contents**

#### What needs to be included in the funding application?

- ✓ Applicant Information
- ✓ Certification Materials (as described in Part I of this workshop)
- ✓ Comprehensive Business Plan
- ✓ Technical Assistance Proposal

### **Applicant Information**

#### What needs to be included:

- $\checkmark$  Applicant contact information and name of any *Affiliate(s)*
- ✓ Applicant organizational characteristics
- ✓ Amount and type of request
- ✓ Affiliate Information Table
- ✓ Environmental Review Form
- ✓ Assurances and Certifications Form
- ✓ If applicable, 501(c)(4) Questionnaire

## TA - Phase One Evaluation Criteria

Selection Factors	<b>Established</b>	Start-Up
Comprehensive Business Plan		
Executive Summary	0	0
Community Development Track Record	10	0
Financial and Operational Capacity	10	4
Market Analysis, Program Design and		
Implementation Plan, and Funding Sources	14	14
Capacity, Skills & Experience of the Management Tea	am 14	30
Projected Activities & Community Development Impa	ct 12	12
Technical Assistance Proposal	40	<u>40</u>
Total Points	100	100

Note: Start-Ups are CDFIs that began incurring operating expenses on or after November 27, 1997.

## FA/TA - Phase One Evaluation Criteria

Selection Factors	<b>Established</b>	Start-Up
Comprehensive Business Plan		
Executive Summary	0	0
Community Development Track Record	10	0
Financial and Operational Capacity	10	4
Market Analysis, Program Design and		
Implementation Plan, and Funding Sources	14	14
Capacity, Skills & Experience of the Management Te	am 14	30
Projected Activities & Community Development Impa	act 12	12
Financial Projections & Resources	10	10
Technical Assistance Proposal	<u>30</u>	<u>30</u>
Total Points	100	100

Note: Start-Ups are CDFIs that began incurring operating expenses on or after November 27, 1997.

2001 SECA Information Sessions

## Comprehensive Business Plan

#### The Sub-criteria are:

- Community Development Track Record
- Financial and Operational Capacity
- Market Analysis, Program Design and Implementation Plan, and Funding Sources
- Capacity, Skills and Experience of the Management Team
- Projected Activities and Community Development Impact
- Financial Projections and Resources

# **Community Development Track Record**

#### **✓** Activities Level Chart

- actual activities over past 3 fiscal years

#### **✓ Community Development Impact Chart**

- actual impact activities over past 3 fiscal years

#### **√** Narrative

- describe impact in Target Market, quantify where possible

## Financial and Operational Capacity

#### **✓** Financial Statements for Applicant

- -Year end audited financials for last 3 years
- Credit Unions include NCUA Form 5300

#### **✓ Portfolio Quality**

- Complete Loan Portfolio Quality Chart

#### **✓** Policies and Procedures

- Complete Policies and Procedures Chart

# Market Analysis, Program Design and Implementation Plan

#### → Market Context, Customers and Demand

- describe your market and discuss demand

#### → Products and Services (current and proposed)

- rates, terms and uses of loan products
- product and service needs of Target Market
- outreach and delivery

# Market Analysis, Program Design and Implementation Plan

#### **→** Funding Sources

- describe strategy for financial viability
- describe plans for diversification of funding

## **→** Community Support

- describe community support from Target Market
- describe development plans used by Target Market

## Capacity, Skills and Experience of the Management Team

#### → Management and Staff Experience

- organizational chart
- narrative describing relationship between skills and experience of staff with current and planned activities
- resumes of key staff persons, advisors and consultants

#### → Board of Directors

- list board members and affiliations, identify officers and key committee members
- describe roles and responsibilities
- resumes or biographical statements

### Projected Activities and Community Development Impact

#### → Activities Levels & Community Development

- complete Activities Level Chart
- complete Community Development Impact Chart
- describe projections from Activities Level Chart and Community Development Impact Chart

### Projected Activities and Community Development Impact

#### → Previous Awardees must:

- describe success in meeting performance goals and financial soundness covenants, and otherwise complying with Assistance Agreements previously executed with the Fund
- describe what additional benefits would be created with additional Fund resources

## Financial Projections and Resources (for FA/TA applicants)

✓ Provide 5 year projected annual financial statements

**✓ Complete Financial Track Record Chart** 

**✓ Complete Matching Funds Chart** 

# Technical Assistance Proposal (TAP)

- **→** Describe the TA needed
  - complete the TAP Request Form
- → Describe the capacity needs of your organization required to achieve the business plan
- → Describe a strategy to obtain TA, include:
  - timing
  - resources needed
  - qualifications of consultants, if applicable
  - include consultant scopes of work, if applicable

## Technical Assistance Proposal (TAP)

#### → Describe how a TA Award will add value to your organization and its services

- -How will the TA award improve conditions in your organization's Target Market?
- -Will meeting capacity building needs translate into greater community development impact?
- If capacity building needs are met, will conditions improve in your Target Market?

## **Technical Assistance Proposal** (TAP)

#### → Describe how a TA Award will add value to your organization and its services

- If staff salary is proposed, is it critical to achieving the objectives in the business plan?
- For applicants applying for FA, describe how the TA award would enable your organization to effectively utilize the FA award and the required matching funds.

#### Review Process - Phase One

#### **Key Review Components:**

- ✓ Completeness and eligibility review
- ✓ Applications are reviewed and scored on a maximum of 100 points

#### **Review Process - Phase Two**

#### **Key Elements:**

- ✓ May have a telephone interview
- ✓ References may be contacted
- ✓ May have a site visit
- ✓ Recommendation memo by Fund staff
- ✓ Final decisions by September 30, 2001

#### Summary: Keep In Mind

#### → The Comprehensive Business Plan and TA Proposal together should clearly explain:

- ✓ where the organization intends to be in 5 years;
- ✓ what capacity building needs must be met in order to achieve the 5 year business plan;
- ✓ if the organization has the management capacity to use the FA or TA award to assist it in achieving its 5 year business plan; and
- ✓ if the business plan and TA proposal are achieved, will this make a difference in its service to its Target Market.

#### **Common Mistakes**

- ✓ Not submitting Application by the deadline
- ✓ Not signing the Application before submitting it
- ✓ Not reading instructions for the eligibility requirements
- ✓ Applicant is not a legal entity at the time the application is submitted
- ✓ Incomplete Comprehensive Business Plan, TA Proposal or not completing all required sections of the application
- ✓ See Checklist on page 2 of the Application

#### CONTACTING THE FUND



Phone: (202) 622-8662

Fax: (202) 622-9184

(202) 622-7754

Main Website: www.treas.gov/cdfi

E-mail Address: cdfihelp@cdfi.treas.gov

### CDFI Fund's On-Line Help Desk

#### **CDFI Program**

## What is the CDFI Fund's On-Line Help Desk?

#### The On-Line Help Desk is a tool designed to:

- help applicants designate eligible Target Markets; and
- 2. provide information on market characteristics.

### **Investment Area by Census Tract or County**

Q: I know the area I want to serve. How do I find out whether it meets the Investment Area requirements?

A: Go to Option 1 on the Help Desk menu. You will need to know your state and county. You can also search by census tract number.

#### **Geo-Coding Investment Area**

Q: I know where my loans or customers are <u>located</u>. How do I find out whether they are in an eligible Investment Area?

A: Go to option 2 on the Help Desk menu. This is the "geo-coding" option. Have the addresses of your loans or customers ready.

#### Eligible Investment Area

Q: I am looking for an area eligible to be an Investment Area. How do I find it?

A: Go to Option 3 on the Help Desk Menu. This is the "fishing expedition" option. You only need to know the State and County that you would like to search.

#### **Native American Communities**

Q: I serve a Reservation-based Native American Community. How do I find out if a Reservation is eligible?

A: Go to the Native American communities button on the U.S. map, select your reservation by name, and print.

#### Designate an Investment Area

Q: How do I select and designate an Investment Area?

A: You need to learn the key functions – Zoom In,
Zoom Out,
Pan, Add,
Deselect,
Send to Test and
Submit

### Investment Area Map and Worksheet

Q: How do I create an Investment Area Map and Worksheet for my application?

A: Select the Map and Worksheet options on the report menu and print.

#### **Market Data Reports**

Q: How do I better understand my market?

A: After selecting an Investment Area, select the "Market Data Reports."
Reports are available on: population, economic and housing characteristics, housing lending, and small business lending.

### Market Data Reports: Economic, Population & Housing

- **✓** Who lives in my Investment Area?
  - Population, race, single family households, education attainment
- **✓** What are the economic conditions in my Investment Area?
  - Median family income, distribution of household income, poverty & unemployment
- ✓ What are the housing conditions in my Investment Area?
  - Housing units, homeownership, distressed housing, overcrowding & affordability

### Market Data Report: Home Mortgage Disclosure Data (HMDA)

**Applications:** How many people are applying for loans in my Investment Area compared to other areas?

Originations: How many people are receiving loans in my Investment Area compared to other areas?

**Denials:** How many people are being denied loans in my Investment Area compared to other areas?

# Market Data Report: HMDA Applications

- ✓ How much demand is there for housing loans in my Investment Area?
  - Number and dollar amount of lending
- ✓ What types of loans are being requested?
  - Total conventional or government programs
- ✓ What types of housing needs are applicants seeking to address?
  - · Home purchase, improvement, refinancing, multifamily
- **✓** Who is receiving loan applications?
  - Top 10 lenders
- **✓** Who are they receiving applications from?
  - Applicant race, income, tract type

## Market Data Report: HMDA Originations

- ✓ How much housing lending is happening in my Investment Area?
  - Number and dollar amount of lending
- ✓ What types of loans are being made?
  - Total conventional or government programs
- ✓ What types of housing is being financed?
  - Home purchase, improvement, refinancing, multifamily
- ✓ Who is making loans?
  - Top 10 lenders
- ✓ Who are they making loans to?
  - Borrower's race, income, and tract type

## Market Data Report: HMDA Denials

- ✓ How many loan requests are being denied in my Investment Area?
  - Number and dollar amount of lending
- ✓ What types of loans are being denied?
  - Total conventional or government programs
- ✓ What types of housing credit is being denied?
  - · Home purchase, improvement, refinancing, multifamily
- **✓** Who is denying loan applications?
  - Top 10 lenders
- **✓** Who is being denied credit?
  - Applicant race, income, tract type

### Market Data Report: Small Business Lending

- How much small business lending is happening in my Investment Area? How does this compare to other areas?
- What is the dollar amount of the loans being made?
- How much credit is being provided to firms with less than \$1 million in revenues?
- What census tracts are receiving small business loans?